

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

IN RE: CLAUDE LORECE WATKINS JR.
ELISE MARIE WATKINS
DEBTOR(S)

CHAPTER 13
CASE NUMBER 09-15053

EXPEDITED MOTION FILED BY DEBTOR(S) TO APPROVE MORTGAGE MODIFICATION

Comes now the Debtor(s), by and through attorney of record, C. Jerome Teel, Jr. and moves the court for an order on the Debtors' Motion to Approve Mortgage Modification.

The Debtor(s) would show unto the Court as follows.

1. The Debtors filed for relief under Chapter 13 of the Bankruptcy Code on December 10, 2009.
2. The Debtors have been approved for a mortgage modification through CitiMortgage Inc..
3. The modification would reduce the ongoing payment to \$1,339.80 at 6.465% interest with escrow included.

DEBTOR(S) MOVE(S):

- (a) for a service of process on all appropriate parties;
- (b) for an expedited hearing to be scheduled at a time convenient for the Court;
- (c) for the Order to Approve Mortgage Modification;
- (d) for plan payments to be adjusted accordingly, if applicable;
- (e) for Debtor's employer to be notified of any change in the amount of payroll deduction, if applicable.

Respectfully submitted this 28th day of June, 2013.

TEEL & MARONEY, P.L.C.

/s/C. Jerome Teel, Jr.
C. Jerome Teel, Jr. 016310
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CERTIFICATE OF SERVICE

I, C. Jerome Teel, Jr., Counsel for the Debtors, do hereby certify that a true and exact copy of the foregoing Expedited Motion to Approve Mortgage Modification has been mailed by US Mail, postage pre-paid, or by e-mail on the 28th day of June 2013 to the following: Debtor, Claude & Elise Watkins, 108 Jackson St., Grand Junction, TN 38039; Chapter 13 Trustee, Tim Ivy; Citifinancial, 1000 Technology Dr., O Fallon, MO 63368.

/s/C. Jerome Teel, Jr.
C. Jerome Teel, Jr.

(Rll)